



**IDAHO FISH & GAME**  
CLEARWATER REGION  
1540 Warner Avenue  
Lewiston, Idaho 83501-5699

October 20, 2004

Mr. Steve Williams  
Acting Forest Supervisor  
Nez Perce National Forest  
Route 2, Box 475  
Grangeville, Idaho 83530

Dear Mr. Williams:

RE: RED PINES DRAFT ENVIRONMENTAL IMPACT STATEMENT

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Red Pines Project (DEIS).

The Red Pines Project area is approximately 103,500 acres in size, located in the Red River watershed, roughly 3 air miles southeast of Elk City. The project would involve timber harvest and watershed improvement activities.

The stated purpose of the project is to treat existing and potential fuel loads to reduce the potential for large-scale wildfire, improve firefighter safety in fire suppression activities and contribute to the social and economic well being of residents and visitors to the project area. The project would remove dead and dying trees as well as green trees (reduce timber stand densities); reduce ladder fuels; maintain existing fire resistant species in areas where understory is encroaching due to fire exclusion. Fuels reduction (harvest) would take place on about 6,465 acres. Harvest includes a range of treatments, including clearcuts, shelterwood/seedtree and pre-commercial thinning. Some road decommissioning and stream restoration activities are included in the project proposal.

Idaho Fish and Game has a number of concerns about this proposed sale.

The greatest proportion and largest blocks of proposed harvest -as well as the overwhelming majority of proposed new road -lie within relatively isolated blocks of timber that have not been previously entered (Main Red River and Trail Creek subwatersheds, see Map 6). We believe that the proposed harvest in these blocks is likely to have adverse environmental impacts that far outweigh potential benefit to be gained from entry. We recommend that the Forest Service modify the Red Pines Project to exclude the Main Red River and Trail Creek units from harvest at this time. We base our recommendation on the following:

*Keeping Idaho's Wildlife Heritage*

1

**Response 7-0**

Thank your for your comments.

**Response 7-1.** Alternatives, wildlife habitat, big game, dropping units.

Alternative E (new alternative presented in the FEIS) greatly reduces the number of acres treated in the main Red River subwatersheds. However, the amount of fuels treatment in the Trail Creek subwatershed remains the same (one unit). The effects to wildlife are disclosed in the FEIS, Chapter III, Section 3.12.

See Response 7-1a.

USFS Red Pines Project

- The proposed harvest areas in the Main Red River and Trail Creek subwatershed areas (as shown on Map 6) are rare, fairly large, previously un-entered stands of timber. These core mature timber stands provide valuable diversity of habitat for wildlife in a landscape that has otherwise been previously, in many cases recently, very intensely logged and roaded.

Past harvest in the area should provide an adequate mix of early- to mid-seral forest habitat for wildlife;

late seral stands like the Main Red River and Trail Creek units remain under-represented in the Project area.

**Response 7-1a** Harvest in large un-entered stands

The FEIS preferred alternative (Alternative E) contains only 20 acres of harvest with excavator piling and no road construction in Trail Creek.

The FEIS preferred alternative (Alternative E) contains 991 acres of harvest and 7.7 miles of temporary road construction; 13.98 miles road decommissioning; and 9.39 miles of road reconditioning in Main Red River. Treatments focus on removing dead and dying lodgepole pine in the pole and small-sized trees, not mature trees. Harvest treatments include 279 acres of pole size trees; 622 acres of small size trees and 72 acres of medium size trees and 18 acres of large size trees. Proposed harvest would primarily occur in two forest cover types: lodgepole pine (290 acres) and mixed mesic conifer (602 acres). The mixed mesic conifer habitats contain a high proportion of lodgepole pine that is dead or dying from the mountain pine beetle epidemic. Based on this, we believe this Alternative E addresses your concerns in Main Red River Creek.

**Response 7-1b** wildlife habitat, early to mid seral

According to our records, Main Red River was initially harvested in the 1960's (292 acres; 2.7% of Main Red River subwatershed) followed by harvest in 1970's (640 acres; 6% of Main Red River subwatershed), 1980's (376 acres; 3.5% of Main Red River subwatershed) and 1990's (60 acres; <1% of Main Red River subwatershed). At total of 13% of Main Red River has been previously harvested. Alternative E increases harvested area in Main Red River subwatershed to 22%. Of note is that areas harvested in the 1960's and 1970's have reached pole to small tree size by this time. As canopy cover closes, big game forage production will decline. Hiding cover has been restored in stands harvested in the 1960's, 1970's and 1980's.

**Response 7-1c** wildlife habitat, late seral

Units proposed for treatment may be old, but are small and pole size trees that contain a high proportion of dead and dying lodgepole pine. Mixed conifer habitats containing a high proportion of dead and dying lodgepole pine in the small tree and pole size classes are not limited in Red River watershed. Many acres (67,000 to 69,000 acres) of similar habitat would remain untreated.

Old Growth habitat (late seral stands) has been allocated in the Main Red River and Trail Creek areas. Trail Creek is located in Old Growth Analysis Unit (OGAU) 03050405 and Main Red River is in OGAU 03050411. All action alternatives in the FEIS propose old growth and replacement old growth allocation of 1,044 acres (14%) in the Trail Creek OGAU and allocation of 1,044 acres (10%) in the Main Red River OGAU. No Forest Plan old growth habitat would be harvested under this proposal.

See response to Comments 13-45, 13-46, and 13-47 for more information.

- The proposed harvest and road building in the Main Red River harvest area would be centered over an important big game travel corridor.

USFS Red Pines Project

Both Main Red River and Trail Creek harvests will have adverse impacts on moose winter habitat.

- New road construction in these harvest units- even if the roads are temporary – is a particular concern. We are concerned that the increase roads will increase wildlife disturbance and vulnerability of big game. However, our larger concern with respect to this Project is the potential impacts on water quality and habitat, which, even if short-term, we find unacceptable.

In our response to the Scoping Notice for the Red Pines Project, we expressed concerns about the potential impacts of the Red Pines project on water quality and fish habitat in Red River. Admittedly, we have proprietary interest in the potential impacts the Red Pines project will have on publicly funded stream restoration efforts that have been completed and are on-going on the F&G Red River Wildlife Management Area. However, our interest is not limited to the WMA; we also are very concerned about the impacts of the project on water quality and fish habitat throughout the Red River watershed and into the South Fork Clearwater River that will be affected by this Project.

**Response 7-1d** wildlife, big game travel corridors

Proposed harvest would result in similar habitat benefits as the existing condition. This is based on the understory vegetative response that occurs when canopy cover is reduced in lodgepole pine habitats. Based on Stone (1995), beneficial forage production would occur.

Road construction generally adversely affects wildlife habitats. In Main Red River, the 7.7 miles of temporary road would be mitigated by decommissioning after use per project design measure item 38 displayed on Table II-3 of the DEIS. These roads would have motorized access restrictions to the general public during use per project mitigation measure item L displayed on Table II-4 of the DEIS. Additionally, nearly 14 miles of existing road in Main Red River would be decommissioned, thus improving wildlife habitat. All access restrictions currently in place would continue per project design measure items 37 and 39 displayed on Table II-3 of the DEIS. Impacts to big game travel would be temporary. There would be long-term habitat improvement.

**Response 7-1e** wildlife, moose habitat

A comparison of MA 21 (Moose winter range) and proposed harvest units in preferred Alternative E shows three units (79, 80, 81 = 125 acres) in moose winter range. Unit 79 is an irregular shelterwood harvest with 60% canopy removal predicted. Unit 80 is a shelterwood harvest with 80% canopy removal predicted. Unit 81 is a shelterwood harvest with 50% canopy removal. Alternative E would treat 2% of MA 21 moose winter range in Red River watershed. The DEIS recognizes treatments in moose winter range and includes project design measures to minimize impacts. Table II-3 items 30 through 33 in the DEIS directly address treatments in moose winter range:

- |         |   |
|---------|---|
| Item 30 | “MA 21 moose/yew: the Pacific yew component would be maintained in clumps where it exists in fuel reduction units.”                     |
| Item 31 | “To the extent practical, slash piles would not be placed within patches of Pacific yew.”   |
| Item 32 | “In MA 21, fuel reduction would only be allowed in those stands with less than 35 percent slope that do not require broadcast burning.” |
| Item 33 | “Broadcast burning would not be prescribed in MA 21, and Pacific yew would not be slashed except to provide room to machine pile.”      |

**Response 7-1f** Wildlife, vulnerability and roads

See response to Comment 7-1d.

**Response 7-2.** Water quality, fish habitat effects

Effects to fisheries and water quality were identified as significant issues and a number of alternatives were considered that addressed this issue. Effects on water quality and fish habitat were considered and are disclosed in Chapter III of the FEIS, Sections 3.5 and 3.6. Alternative E has been developed to minimize the short-term effects of the project while emphasizing watershed recovery through maximizing restoration projects. Effects within the Red River watershed and the South Fork Clearwater River were analyzed and disclosed in Chapter III, Sections 3.5 and 3.6

It is very clear from the DEIS that water quality and fish habitat *will be* degraded as a result of this Project. We are disturbed by the short-term and, in some subwatersheds, long-term or permanent degradation of water quality and fisheries that is predicted in the DEIS. And, although we often support projects in which short-term impacts are necessary to achieve long-term benefits, we are not assured by evidence presented in this DEIS that long-term benefits will accrue from the Project, or even that long-term recovery will occur.

- We are particularly disappointed that the Forest Service apparently views water quality degradation as an acceptable consequence of the Project. The proposed action includes an amendment to Appendix A of the Forest Plan that would allow activities that will result in adverse impacts (like sediment delivery to streams) in subwatersheds that currently fail to meet Forest Plan guidelines if a long-term upward trend may result. Most objectionable is that the proposed amendment would also eliminate upward trend likely given project restraints. If implemented, this amendment would essentially endorse activities, which would not only exceed Forest Plan guidelines, but would also to violate Idaho State water quality anti-degradation standards and ignore TMDL objectives.

The Forest Service justification for amending Appendix A is that (a) economics prevent harvest goals from being met without the amendment, and (b) a long-term upward trend will balance the short-term adverse impacts. As stated previously, it is our opinion that the DEIS fails to present evidence to support that a long-term upward trend will result from this Project to balance short-term adverse impacts. Further, we believe it is objectionable to eliminate requirements for upward trends in any watersheds. No watersheds should be viewed as sacrifice areas in order to achieve arbitrary harvest goals.

We recommend that instead of amending Appendix A to achieve a specific harvest goal, you modify harvest prescriptions, enhance mitigations, revise harvest site selections, or use other means to ensure both short-term protection and long-term enhancement of all watersheds. Adequate timber is available elsewhere in and near the Project area to meet goals to support the local economy --entry into the Main Red River and Trail Creek stands is not necessary to support the local economy. And there should be no circumstances in which "project restraints" would require the Forest Service to decide that long-term degradation of habitat and water quality is acceptable. Short-term impacts are acceptable, but only as long as the long-term benefits can be clearly demonstrated.

**Response 7-3.** Water quality, fish habitat effects, benefit.

We have developed Alternative E in response to comments concerning fish and water quality to the effects presented in the DEIS. Alternative E does not suspend Forest Plan guidelines regarding upward trend in the Red River watershed and is expected to result in a long-term improving trend in both watershed and stream conditions. See the FEIS, Appendix H for additional clarification of the analysis on upward trend.

**Response 7-4.** Amendment – upward trend. State & Fplan Standards. Water quality.

Please see Response 1-2.

Alternative E was developed with a decrease in short term impacts and an increase in long term benefits. The FEIS concludes that this alternative will result in an upward trend in aquatic habitat carrying capacity. Consultation is underway with the IDEQ to determine whether the new Alternative E in the FEIS complies with the South Fork Clearwater River TMDLs.

See Response 7-4 and 7-5.

**Response 7-4a.** Alternative modification vs Amendment.

We have developed Alternative E in response to comments concerning fish and water quality to the effects presented in the DEIS. This alternative reduces the number of fuels treatment and includes restoration improvements.

IDFG is, of course, especially concerned about water quality and fisheries impacts on the Red River Wildlife Management Area stream restoration project --the preponderance of new road building and harvest in the Red Pines Project will be a few miles upstream of the Wildlife Management Area restoration project. The DEIS looks at aquatic impacts in the Project area as a whole, but does not analyze potential impacts from the Project on water quality or habitat by subwatersheds or by stream segments downstream of the Main Red River and Trail Creek. The EIS should analyze and report impacts to water quality and habitat on a subwatershed basis, at a minimum. The EIS should be able to demonstrate that forest management activities will result in upward trends in each subwatershed.

As stated previously, we often support projects that have short-term impacts, when those short-term impacts are balanced by long-term environmental gains. However, the DEIS fails to provide adequate evidence that this project will result in long-term benefits -even if the proposed road decommissioning and other improvement projects are completed:

- The DEIS (III-90) makes the case for us that not only are adverse impacts expected from the Project, but that those impacts may be irreversible: "Technologies are currently not in place to quantitatively predict how long sediment from {Alternative B} ...would remain in low gradient channels. Therefore, we can only speculate that sediment conditions in Red River will improve over the foreseeable future." (our underline)

**Response 7-5. water quality, fisheries. Effects analysis.**

The Water Quality and Fisheries sections of Chapter II display the effects to each subwatershed that has a proposed activity. Appendix H of the FEIS displays more detailed information regarding sediment yield for each subwatershed, as well as listing all watershed improvement activities by subwatershed. The aquatic trend analysis in Appendix H of the FEIS is the documentation leading to the conclusion that an upward trend in aquatic condition is predicted in the long term for many subwatersheds under Alternatives B, C and D and for all subwatersheds under Alternative E. This analysis takes into account the positive and negative effects of the project activities in the short and long term. A detailed upward trend analysis for each subwatershed is located in the Red Pines Analysis file.

**Response 7-6. water quality effects. Benefit, long-term.**

The aquatic trend analysis in Appendix H of the FEIS is the documentation leading to the conclusion that an upward trend in aquatic condition is predicted in the long term for all subwatersheds under Alternative E. This analysis takes into account the positive and negative effects of the project activities in the short and long term.

Improvement projects will result in lower road densities, lower streamside road densities, more large woody debris in streams, improved riparian condition, and improved stream condition in Lower Red River where channel reconstruction is proposed and other areas where structure maintenance and sediment trap decommissioning are proposed. Therefore, there is adequate evidence that all action alternatives (including Alternative E) will result in improved watershed condition and improved stream conditions where instream actions are proposed. The issue with short-term impacts versus long-term improvement is related mainly to deposited sediment; that is where the uncertainty of future prognosis is relevant. We believe Alternative E addresses this uncertainty.

**Response 7-7. water quality, sediment.**

Section 3.1.7.2 and Appendix H of the FEIS address potential long-term effects to the deposited sediment indicator from Alternative B and uncertainty regarding residence times should deposited sediment increase from implementation of Alternative B. Sediment effects from Alternative C would be similar. Uncertainty of the duration of an effect does not necessarily imply that the effect is *irreversible*. In any event, uncertainty is much less for Alternative D and even less so for Alternative E, which is also discussed in these sections. Alternative E was developed to minimize short-term impacts, accelerate watershed recovery, and provide for an upward trend in habitat carrying capacity. Sediment impacts from Alternative E would not be expected to be irreversible given lower short-term increases in sediment yield and long-term declines in most subwatersheds.

- The determinations, or speculation, in the DEIS that the project will result in a long-term upward trend is based on NEZSED and FISHSED models that Forest Service's own data indicates are unreliable (e.g., see Appendix H-5 regarding variability in reliability of NEZSED models to predict yield) and that sediment effects not modeled by NEZSED may occur (III-91).

3

#### USPS Red Pines Project

- The DEIS does not indicate what changes in flow and, therefore, what changes in sediment transport might be expected as a result of the project. This is especially critical if one considers that the already-questionable NEZSED predictions are most unreliable for above average water years (Append H-5). It is critical that predictions (and appropriate project plans/mitigations) for sediment yield be conservative enough to protect water quality and ESA-listed fisheries in Red River and tributaries in both the short-and long-term. We recommend that the DEIS provide an analysis of and express effects of the project on water yield in terms of change in peak flow resulting from the Project, including changes in the timing of peak flows.
- Long-term upward trend is projected for the Project area as a result of road decommissioning activities and stream restorations that are proposed to offset short-term impacts from Project activities. However, the DEIS only lists a range of actions that might be implemented, it does not specify the type and location of stream restoration projects that will be implemented, nor estimate impacts vs. benefits of those actions.

**Response 7-8.** Water quality, upward trend, models, unreliable.

See responses 13-18, 14-40.

NEZSED and FISHSED contribute to the analysis of condition and trends. However, other information is also used in the trend analysis of aquatic condition. This includes the trend analysis matrix found in Appendix H.

The FISHSED model was not used to predict upward trend. As discussed in section 3.1.7.1 and Appendix H of the FEIS, FISHSED only considers short-term peaks in percent over base and does not have the capability to model long-term changes in sediment yield. Road decommissioning was included in NEZSED modeling, but instream habitat improvement, channel reconstruction, sediment trap removal, removal of failing log culverts, and stream crossing upgrades to provide for upstream fish migration were not. These activities are proposed to improve watershed and stream condition and provide for an upward trend. These projects may result in localized additions of sediment and/or liberation of sediment already in streams substrates, but they are also expected to result in long-term declines in sediment and prevent future sediment additions from crossing failures and streambank erosion.

**Response 7-9.** water yield effects, sediment transport, fisheries

Equivalent Clearcut Area (ECA) is used as an indicator of the water yield effects of project activities. Effects of implementing each alternative on water yield, including peak flows, is found in Chapter III of the FEIS, Section 3.5.6.1.

The ECA and sediment yield analyses in Chapter 3 of the FEIS encompasses the entire Red River watershed. Tables in Section 3.5.6.1 included the ECA or sediment yield from all of the subwatersheds contributing to the of Red River (See Lowest Red River, the last row of each table. This is further explained in Appendix H, specifically Figures E.1 and E.2, along with the accompanying narrative. The cumulative effects sediment yield analysis for the South Fork Clearwater River covers all known activities that could be modeled upstream of the Nez Perce National Forest boundary. The time frame for this part of the analysis is through 2012. At this point, post-project sediment yield is assumed to have stabilized. ECA continues to recover gradually over time as the forest canopy regrows.

**Response 7-10.** Proposed action. Implementation. Location and timing.

Stream channel improvements are described in Chapter II, Section 2.3.3.2 of the FEIS, with effects of implementation analyzed in Chapter III. Location and quantity of the restoration improvements, by alternative, is shown on maps: 8b (Alt B), 8c (Alt C), 8d (Alt.D) and 8e (Alt.E). FEIS, Appendix H also lists the restoration improvements by type, and by subwatershed.

- The only watershed improvement project the NEZSED model was used to calculate was road decommissioning -sediment impacts from temporary road installation and maintenance, other road improvements and maintenance, culvert replacement, stream restoration and many other sediment-producing activities are not included in the calculations of sediment yield. These shortcomings should be corrected in the EIS.

- It is not evident how road decommissioning -which is defined in the DEIS as a range of actions from re-contouring to abandonment -could balance impacts from road construction and other harvest activities and result in an upward long-term trend in water quality and fish habitat. For instance, temporary road construction was judged by the Forest Service to be the largest contributor to sediment yield; yet road decommissioning is given a "Low" rating for impact on overall aquatic condition (Appendix H). Also, "many of the roads proposed for decommissioning are currently overgrown and would simply be abandoned" (Page II-1). Thus, much of the road decommissioning is simply an administrative action that will cause no measurable improvement in water quality or habitat.

The DEIS needs to clearly describe and analyze impacts from proposed new road construction and road improvements, analyze impacts from use and maintenance of those temporary and improved roads over their lifetime, and define, describe and evaluate impacts from decommissioning temporary roads. The EIS should then measure those and all other Project impacts against the benefits from decommissioning existing roads and other improvements.

- The Project area appears to have been expanded to include road decommissioning and stream restoration activities that are far removed from areas in which intensive timber management and new road construction would occur. Thus, many of the improvement projects would benefit only isolated subwatersheds, many of which would be well removed from the most intensively harvested areas. Calculating the benefits of far-removed stream or road improvements and stating that those improvements cause an upward trend for the entire action area obscures the potential for adverse water quality and habitat impacts and downward trends that are most likely to be concentrated in

USFS Red Pines Project

tributaries within the harvest areas and in Red River reaches closest to harvest areas. We expect that the impacts of harvest and road building/maintenance activities, especially in the most heavily harvested Main Red River and Trail Creek units, will be most concentrated on Main and Lower Red River segments and tributaries in and around those harvest units. Therefore, the EIS should analyze and report impacts and trends on a subwatershed basis, at a minimum, as well as on a Project area-wide basis.

#### **Response 7-11.** water quality, modeling. Improvements.

The sediment yield for temporary road construction and road improvements at the moderate and high level of reconstruction were incorporated into the NEZSED modeling in both the DEIS and FEIS. Little additional sediment yield is assumed to occur from normal road maintenance and low levels road reconstruction. Sediment yield from instream activities such as culvert replacements and instream improvements are disclosed in the FEIS, though not modeled through NEZSED.

#### **Response 7-12** water quality, fish habitat, upward trend, improvements and road work.

Roads that would be decommissioned by abandonment need to meet certain requirements. These are discussed in Chapter III, Section 3.13, Transportation. The requirements refer to the length of the road, the height of cut and fill slopes, the lack of erosion or soil compaction issues, the amount of existing vegetation, and access to it. If the answer to these requirements satisfy the question of the road and are not likely to cause any detrimental effects in the future, then it would be abandoned.

On this project all of the road maintenance or construction work is within the road prism. Annual maintenance is the work done each year to keep the road in a good, suitable driving condition. Deferred maintenance is when this work has not been done for several years. No severe damage has been done. It is just more costly because the brush is larger and thicker and the surface has started to lose its shape.

The effects of road construction, improvements, maintenance and decommissioning are disclosed in the FEIS in terms of water yield, sediment yield and fish habitat effects, in Chapter III. Upward trend in aquatic habitat conditions was determined for all affected subwatersheds under the new Alternative E. Certain subwatersheds were determined to not meet the upward trend provision in Alternatives B, C and D.

#### **Response 7-13.** water quality, fish habitat, benefits spatially from activities, analysis scale.

Positive and negative effects of project activities are distributed throughout the affected areas of the Red River watershed. Activities include some which are instream, near-stream and well-separated from streams. It is impossible to determine short term effects or long term trends at every stream reach within the project area. The effects and trend determinations were made at the subwatershed (6th code) scale and then aggregated to the watershed (5th code) and subbasin (4th code) scales.

- We agree that portions of the Main Red River and Trail Creek stands are at risk for wildfire; however, we do not agree that fire in either of those blocks would present a substantial enough hazard to public health or property to require harvest on that basis - especially considering the risk to watershed health. While we support "defensible space" projects to protect communities like Elk City, these stands are isolated, not located near communities. Recent aerial photography illustrates the significant harvest that has already occurred around these stands, providing an additional buffer. Because there is little risk to health or property, and because the DEIS fails to demonstrate that impacts (or benefits) of harvest outweigh potential impacts to water quality, fish and fish habitat should wildfire occur, we recommend that you do not enter the Main Red River and Trail Creek watershed units. Further, we encourage you to plan to allow those areas to burn should nature intervene in the future.

We recommend that the effectiveness-monitoring plan for the Red Pines Project be enhanced considerably. Scarcity of post-project monitoring data is one of the primary reasons it is so difficult to predict and communicate the environmental effects and potential benefits of projects like Red Pines on water quality and habitat. The monitoring plan for the Red Pines project currently appears far too limited to provide a useful assessment of cause-effect or recovery, nor will it provide information that might be useful for planning future activities. For instance, the DEIS states only that "established protocols" will be used to monitor "effectiveness of road decommissioning and stream restoration projects. What protocols will be used, what parameters will be measured, for how long, and where?"

We recommend the following monitoring enhancements:

- According to the DEIS, the Forest Service has trend data and stream morphology data from three long-term stations in the Red River watershed. However, two upper Red River aquatic monitoring stations are outside of the affected area and the Trapper and SF Red River stations will provide information, but only for the limited activities planned within those subwatersheds. None of those stations will provide information regarding current conditions or trends in the mainstem Red River watershed or provide insights into impacts reaching the South Fork Clearwater from the Project area. We recommend adding at least one long-term monitoring station at the most downstream point in Red River within the Project area. Discharge, suspended sediment, bedload sediment, conductivity and stream temperature should be measured on a continuing basis. Ideally, additional monitoring stations would also be established at several points upstream so impacts from various phases of the proposed project could be monitored long-term.
- The IDFG Red River WMA is a good mid-point for measuring impacts of the Project. Some long-term baseline habitat and water quality data is available for that reach and the WMA is

#### **Response 7-14.** vegetation, fuels, public risk

Because we currently do not have the authority for wildland fire use for naturally ignited fires within the project area, all fire starts require a suppression response (fire control) for them. By treating areas within these portions of the project area, we will be allowing for opportunities for fire suppression resources to safely and more effectively initiate a suppression response. These treatment areas will also modify fire behavior during normal conditions by slowing fire advancement, reducing the opportunity for surface fires to transition to crown fires, and providing areas where crown fires would transition back to surface fires.

#### **Response 7-15.** Monitoring, water quality and fish habitat, more details.

Appendix I of the FEIS is a summary of the monitoring activities that are proposed with the Red Pines project. Detailed monitoring plans (with protocols) are already in place or will be developed prior to implementation. Each year the Forest prepares an annual monitoring plan and report, and is submitted to agencies during the annual coordination meeting (Clearwater River). This document will include the detailed monitoring plans (implementation & effectiveness) related to the Red Pines project.

The BLM Cottonwood Office has established and monitored an instream site near the mouth of Red River (River Mile 0.1) since 1993 (*most downstream point*). The Nez Perce National Forest will coordinate with the BLM in terms of continuation of this site and utilization of the data. Monitoring protocols in place at this site include substrate sediment composition and water temperature. Stream discharge and sediment yield are not measured at this site.

These parameters are measured by the Nez Perce National Forest at three other locations within the Red River watershed (Upper Main Red-2; Trapper Creek -1). The Forest also has several fish habitat and channel morphology monitoring stations at other points in the Red River watershed. These sites, including the BLM station are referenced in Appendix I of the FEIS.

There are current efforts to complete monitoring on the main South Fork Clearwater River in relation to the TMDL. The TMDL Technical Advisory Committee is currently developing the plans.

The Forest currently operates gaging stations to monitor streamflow, suspended and bedload in upper main Red River, South Fork Red River, and Trapper Creek. Temperature monitoring is also occurring throughout the watershed.

In addition, the forest is currently consulting with the NOAA-Fisheries and the Fish & Wildlife Service on the Red Pines project. We will receive Biological Opinions that may require addition monitoring. The required monitoring would be added to monitoring plans for the Red Pines project.



USFS Red Pines Project

not far downstream of the more intensive Main Red River harvest unit. We should note, however, that past habitat monitoring on the IDFG Red River WMA mentioned in the DEIS is conducted by University of Idaho, not by IDFG. (IDFG has conducted extensive fish surveys in the WMA reach.) UI annual monitoring includes stream morphology, sediment size and embeddedness and various other physical parameters. Water quality parameters are not routinely monitored, though some temperature data is available. The UI monitoring is contingent on continued funding, so there is no assurance that monitoring will continue. We would be very pleased to work with the Forest Service to establish a water quality monitoring site on the WMA, as well as to obtain support to continue the UI habitat assessments.

We believe it would be especially beneficial to gather additional data on stream flows, suspended sediment and bedload sediment at multiple sites before, during and after Project activities to ground-truth NEZSED, FISHSED and other predictions used to evaluate this Project and to obtain information that will be used to predict effects of future forest management activities. We encourage you to dedicate some funding derived from this sale to that purpose.

Thank you for the opportunity to comment on the Red Pines Project.

Sincerely,

/s/ Cal Groen  
Clearwater Regional Supervisor

CG/rh/ ss

cc: Jerome Hansen  
Tracey Trent

**Response 7-16.** Monitoring.

Thank you for this information and your cooperation

**Response 7-17.** Monitoring, additional data, water quality and fish habitat.

Streamflow, suspended and bedload data have been collected at three gaging station sites in the Red River watershed since 1986. Project activities would occur above all three stations. Plans are to continue monitoring these stations. The data have been used to test NEZSED. The results of these studies are summarized in Appendix H.

**This page left intentionally blank.**